

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE)	MDL NO. 1456
LITIGATION)	
)	CIVIL ACTION: 01-CV-12257-PBS
)	
THIS DOCUMENT RELATES TO:)	Judge Patti B. Saris
ALL CLASS ACTIONS)	
)	

**JOINT MOTION TO ENLARGE THE TIME
FOR DEFENDANT GLAXOSMITHKLINE, INC.
TO RESPOND TO PLAINTIFFS' MOTIONS TO COMPEL**

The parties hereby move to enlarge the time for defendant GlaxoSmithKline, Inc. ("GSK") to respond to plaintiffs' pending motions to compel to March 15, 2005, as follows:

1. Plaintiffs' Motion to Compel Defendant GlaxoSmithKline, Inc. to Produce Documents in the Manner Required by Rule 34(b), filed February 3, 2005.
2. Plaintiffs' Motion to Compel Defendant GlaxoSmithKline, Inc. to Produce Rule 30(b)(6) Witnesses, filed February 3, 2005.

The parties hereby agree to enlarge the time for response to March 15, 2005. The reason for this request is that GSK has agreed to produce document source information and witnesses which may result in the resolution of the motions.

WHEREFORE, for the foregoing reasons, the parties respectfully request that this motion be granted.

Respectfully submitted,

By /s/ David Nalven

Thomas M. Sobol
David S. Nalven
Edward Notargiacomo
Hagens Berman Sobol Shapiro LLP
One Main Street
Cambridge, MA 02142
Telephone: (617) 482-3700
Facsimile: (617) 482-3003

Steve W. Berman
Sean R. Matt
Hagens Berman Sobol Shapiro LLP
1301 Fifth Avenue, Suite 2900
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594

LIAISON AND CO-LEAD COUNSEL

Eugene A. Spector
Jeffrey Kodroff
Spector, Roseman & Kodroff, P.C.
1818 Market Street, Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300
Facsimile: (215) 496-6611

Marc H. Edelson
Hoffman & Edelson
45 West Court Street
Doylestown, PA 18901
Telephone: (215) 230-8043
Facsimile: (215) 230-8735

By /s/ Geoffrey E. Hobart

Geoffrey E. Hobart
Mark D. Seltzer
Matthew J. O'Connor
Holland & Knight LLP
10 St. James Avenue
Boston, MA 02116
Telephone: (617) 523-2700
Facsimile: (617) 523-6850

Frederick G. Herold
Dechert LLP
975 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 813-4930
Facsimile: (650) 813-4848

Thomas H. Lee II
Dechert LLP
4000 Verizon Tower
1717 Arch Street
Philadelphia, PA 19103-2793
Telephone: (215) 994-2994
Facsimile: (215) 994-2222

Mark H. Lynch
Ethan M. Posner
Covington & Burling
1201 Pennsylvania Avenue
Washington, DC 20004
Telephone: (202) 662-6000
Facsimile: (202) 662-6291

Kenneth A. Wexler
Kenneth A. Wexler & Associates
One North LaSalle Street, Suite 2000
Chicago, IL 60602
Telephone: (312) 346-2222
Facsimile: (312) 346-0022

Samuel Heins
Brian Williams
Heins, Mills & Olson, P.C.
700 Northstar East
608 Second Avenue South
Minneapolis, MN 55402
Telephone: (612) 338-4605
Facsimile: (612) 338-4692

CO-LEAD COUNSEL

Dated: March 1, 2005

CERTIFICATE OF SERVICE

Docket No. MDL 1456

I, David S. Nalven, hereby certify that I am one of plaintiffs' attorneys and that, on March 1, 2005, I caused copies of the parties' Joint Motion to Enlarge the Time for defendant Glaxosmithkline, Inc. to Respond to Plaintiffs' Motions to Compel to March 15, 2005 to be served via VeriLaw on all counsel of record.

/s/ David S. Nalven

Dated: March 1, 2005